

# **EXHIBIT Z**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' RESPONSES TO PLAINTIFF'S  
FIRST SET OF REQUESTS FOR ADMISSION**

Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill") submit the following responses to Plaintiff's First Set of Requests for Admission.

**OBJECTIONS TO DEFINITIONS**

1. Castle Hill objects to the definitions of "Castle Hill Gaming," "CHG," "You," "Your," and "Yours" to the extent the definitions purport to relate to or require the disclosure of information from Castle Hill's attorneys that is protected by attorney-client privilege or the work product doctrine, or to the extent the definitions refer to documents or information in the possession of Castle Hill's outside counsel that was obtained through discovery in the course of this litigation.

2. Castle Hill objects to the definition of "Confidential Information" as overly broad, ambiguous, and confusing in that it does not define the specific information that VGT views as confidential. VGT has not described its purported "Confidential Information" with reasonable particularity.

3. Castle Hill objects to the definition of “VGT Documents” as overly broad, ambiguous, and confusing. VGT has not defined or described with reasonable particularity what documents it believes fit the definition of “created by or at VGT, or that are otherwise property of VGT.”

4. Castle Hill objects to the definition of “Former VGT Employees” as overly broad, ambiguous, and confusing. VGT has not specified which employees this definition refers to or provided a list of all individuals it has used as “consultants.”

5. Castle Hill objects to the definition of “VGT Confidential Information” as overly broad, ambiguous, and confusing. The definition does not specify what information VGT is referring to, nor does it explain or describe any information that VGT believes was “created by or at VGT, or that is otherwise property of VGT.” VGT has not described purported “VGT Confidential Information” with reasonable particularity.

### **SPECIFIC OBJECTIONS AND RESPONSES**

**REQUEST NO. 1:** Admit that at least one Former VGT Employee took VGT Documents with him/her when leaving VGT.

**RESPONSE:** Castle Hill incorporates its objection above to the term “VGT Documents” and because in the context of this request, the phrase is overly broad in not being limited to documents potentially at issue in this action. Castle Hill further objects to this request because it seeks information regarding the actions of individuals who were former VGT employees or “consultants” and the definition is thus overly broad for this reason as well. The Request is further overly broad in that it is not limited to documents given to Castle Hill or within Castle Hill’s custody or control. Upon reasonable inquiry, Castle Hill is without knowledge or information sufficient to admit or deny what every former VGT employee or consultant may or

may not have done at the time he or she left VGT. On this basis, and without waiver of the foregoing objections, Castle Hill denies this request.

**REQUEST NO. 2:** Admit that at least one Former VGT Employee brought VGT Documents with him/her from VGT to CHG.

**RESPONSE:** Castle Hill incorporates its objections above to the terms “Former VGT Employee” and “VGT Documents,” and will respond based on Castle Hill employees known to be former employees of VGT and documents which were utilized in the creation or development of any of the games at issue in this case. Subject to the foregoing, Castle Hill denies this request.

**REQUEST NO. 3:** Admit that at least one Former VGT Employee made VGT Documents available to CHG.

**RESPONSE:** Castle Hill incorporates its objection above to the terms “Former VGT Employee” and “VGT Documents,” and will respond based on Castle Hill employees known to be former employees of VGT and documents which were utilized in the creation or development of any of the games at issue in this case. Without waiver of the foregoing objections, Castle Hill denies this request.

**REQUEST NO. 4:** Admit that VGT Documents are in your possession, custody, or control.

**RESPONSE:** Castle Hill incorporates its objections above to the terms “VGT Documents” and “your,” and will respond based on documents which were utilized in the creation or development of any of the games at issue in this case. Without waiver of the foregoing objections, Castle Hill denies this request.

**REQUEST NO. 5:** Admit that at least one Former VGT Employee took VGT Confidential Information with him/her when leaving VGT.

**RESPONSE:** Castle Hill incorporates its objections above to the terms “Former VGT Employee” and “VGT Confidential Information.” Castle Hill further objects to this request